



State of Utah
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF OIL, GAS AND MINING

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March 18, 1994

TO: Minerals File

FROM: Tony Gallegos, Reclamation Engineer *adg*

RE: Site Inspection, Larson Limestone Company (LLC), Larson Limestone Mine, S/049/011, Utah County, Utah

Date of Inspection: March 17, 1994

Time of Inspection: 1000 - 1635

Conditions: Mostly sunny, slight breeze from the north

Participants: Farrell Larson, LLC; Buck Rose, Utah County; Wayne Hedberg, Tony Gallegos, and Travis Jones, DOGM

Purpose of Inspection: To determine the extent of the disturbed area at this site according to the definitions under the Minerals Rules.

The inspection began with a general discussion with all parties expressing issues of concern. Inspectors from MSHA were also onsite today for a safety inspection.

Mr. Larson explained the company's general plans for mining, and the proposed addition of a new maintenance building onsite. LLC plans to mine the area generally described as being south of the draw which is south of the adit (this includes the existing quarry areas). They use overburden for road base or sell it as product; so there will be little, if any, waste dumps. The new building would be located just north of the truck scale area. LLC would like to post a bond amount which satisfies all concerns and allows them to proceed with the construction of the new building. Materials for the new building have already been ordered and are being shipped. No drilling or blasting was scheduled at the mine today. Some work was being done on the crusher. A layer of crushed limestone was being placed on the building site and graded out. Haul trucks were coming and going from the site.

Mr. Rose explained the issues concerning Utah County. LLC will need a building permit from the county in order to erect the new building. The county will not issue a building permit until LLC posts a reclamation surety with the county or the Division, and



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obtains a business license. In addition, the building site must meet certain fire and safety codes prior to issuance of a building permit. The building plans must also be reviewed by the county prior to issuing a building permit. The county ordinances regarding mining are not based upon the size of the disturbance.(?) The county ordinances base reclamation of highwalls or slopes on the natural angle of repose of the material. The county recognizes the reasoning for the variance to the Division's highwall standard at this site. The county has a bonding minimum of \$1,600/acre; and, typically, that is what the bonds have been based upon. The county can ask for a higher bond amount if the situation warrants. The county would like the opportunity to comment on any roads which the Division proposes to grant a reclamation variance on. The county could accept (has accepted) reclamation sureties in the form of: surety bond, cash bond, escrow, CD and ILOC. The county would recognize a bond posted with the Division as long as the operator signs a written agreement (letter) stating that if the bond is released by the Division/State the bond will be transferred to Utah County before being released. The county wants the reclamation plan for the site to conform to the stricter of the two reclamation standards (the two being Utah County's standards or DOGM's standards).

Wayne Hedberg explained the Division permit requirements for a small mining operation which is enlarging to a large mining operation. Division rules require a mine operator to file a Notice of Intention to Commence Large Mining Operations (NOI-LMO) and receive Division approval **before** enlarging beyond five acres of surface disturbance. In this case, if the operation is found to have exceeded the five acre disturbance limit the Division Director and/or Board of Oil, Gas and Mining will need to decide what the next permitting action should be. Approval of a new NOI-LMO would ideally take a minimum of 90 days from submittal to Board approval, and typically this process takes six months or more. Included in those 90 days is a 30 day public comment period, a 30 day Division review period, and possibly 30 days of waiting to be presented to the Board.

It may be possible for the Division to accept an interim reclamation surety while the NOI-LMO was being reviewed **and** allow Larson to operate within a specific area; or with certain conditions during the interim **until** final approval is granted by the Division and Board. The interim surety option would be decided at the Division Director/Board level. Division reclamation sureties average from \$2,500 to \$3,000 per acre. This average includes five years of escalation. Division sureties are reviewed every five years as prescribed by a directive from the Board.

The permitting information required in going from a small mine operation to a large mine operation is essentially an increase in the amount and detail of information required. A large mining plan is made up of two main sections: a mining plan, and a reclamation plan. The plans may span a time frame of anywhere from five to fifty years into

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the future. The operator may amend or revise the plan at any time and as needed. The LLC operation is currently operating under a small mining notice of intention with several variances to the operation and reclamation practices. The variances allow LLC to: 1) leave pit highwalls at angles steeper than 45 degrees at final reclamation, 2) leave roads which have a postmine use unreclaimed, and 3) not salvage topsoil in areas which are too steep to safely work on. These variances were part of the small mine operations notice of intention and did not include specific references to areas of the site which these variances would be applied to. MSHA requirements for LLC highwalls require a 10 foot wide bench (or setback) from the face of the highwall. LLC will probably have a bench every 60 vertical feet at the time of final reclamation.

The meeting concluded with the understanding that the Division would inform LLC and Utah County of the results of the measurements. Based upon the measurements, the Division may request/require that LLC post a reclamation surety and file a large mining operation.

After the meeting, Division staff proceeded to measure and photo document the site, working from the highest areas down to the truck scale area. Details of the area measurements will be presented on a separate attachment.

jb
cc: Farrell Larson, Larson Limestone Co.
Buck Rose, Utah County
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